IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA FLORENCE DIVISION

Joseph Baisi,	: :
Plaintiff,	: Civil Action No.:
v. Southwest Credit Systems, L.P.; and DOES 1-10, inclusive,	PLAINTIFF'S ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES
Defendants.	: : :

Pursuant to Local Rule 26.01, the Plaintiff, Joseph Baisi, by undersigned counsel, states as follows:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

Answer: None.

- (B) As to each claim, state whether it should be tried jury or nonjury and why.

 Answer: Each claim in the Complaint should be tried before a jury as jury trials are provided for under applicable federal law, and Plaintiff desires a trial by jury.
- (C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

Answer: The party submitting these responses is not a publicly owned company.

Entry Number 3 4:13-cv-00835-RBH Date Filed 03/28/13 Page 2 of 3

(D) State the basis for asserting the claim in the division in which it was filed (or the

basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

Answer: The basis for asserting the claim in this division is that a substantial part of the

events giving rise to the claims occurred in this division, namely phone calls that violated

applicable law made to a phone number located in this division.

(E) Is this action related in whole or in part to any other matter filed in this District,

whether civil or criminal? If so, provide: (1) a short caption and the full case number of the

related action; (2) an explanation of how the matters are related; and (3) a statement of the status

of the related action. Counsel should disclose any cases which may be related regardless of

whether they are still pending. Whether cases are related such that they should be assigned to a

single judge will be determined by the Clerk of Court based on a determination of whether the

cases: arise from the same 26 or identical transactions, happenings, or events; involve the

identical parties or property; or for any other reason would entail substantial duplication of labor

if heard by different judges

Answer: No.

Dated: March 28, 2013

Respectfully submitted,

By

Brian J. Headley, Attorney at Law

District of South Carolina Bar ID No. 11427

145 Historic Drive

Mount Pleasant, SC 29464

Telephone: (855) 301-2100 Ext. 5532

Facsimile: (888) 953-6237

bjheadley@yahoo.com

bheadley@lemberglaw.com

2

Of Counsel To Sergei Lemberg LEMBERG & ASSOCIATES L.L.C. A Connecticut Law Firm 1100 Summer Street, 3rd Floor Stamford, CT 06905

Telephone: (203) 653-2250 Facsimile: (888) 953-6237